

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., <i>et al.</i> , ¹)	Case no. 01-01139 (KG)
)	(Jointly Administered)
Reorganized Debtors.)	
)	Ref. Docket No. 929575, 32838
)	

**NOTICE OF WITHDRAWAL OF MOTION FOR SUMMARY JUDGMENT
PURSUANT TO FED.R.BANKR.P. 7056 FOR PARTIAL ALLOWANCE AND
PARTIAL DISALLOWANCE OF CLAIM NO. 7021, FILED BY NORFOLK
SOUTHERN RAILWAY COMPANY**

Pursuant to an agreement with Norfolk Southern Railway Company (“Norfolk Southern”), the above captioned reorganized debtors (the “Reorganized Debtors”) hereby withdraw the *Motion of the Reorganized Debtors for Summary Judgment Pursuant to Fed.R.Bankr.P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021, Filed by Norfolk Southern Railway Company* [Docket No. 929575] filed on October 13, 2016 and related *Omnibus Memorandum in Support of Granting the Reorganized Debtors’ Summary Judgement Motion, Denying Norfolk Southern’s Cross-Motion and Disallowing Norfolk Southern’s Indemnification Claim* [Docket No. 32838] filed on March 8, 2017.

Dated: August 17, 2017

KIRKLAND & ELLIS LLP
Adam C. Paul
John Donley, P.C.
300 North LaSalle Street
Chicago, IL 60654
(312) 862-2000

and

¹ The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) and W. R. Grace & Co.-Conn. (“Grace-Conn.”).

THE LAW OFFICES OF ROGER HIGGINS, LLC

Roger J. Higgins
1 North Bishop Street
Suite 14
Chicago, IL 60607-1823
(312) 666-0431
and

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
(302) 652-4100
(302) 652-4400
Email: ljones@pszjlaw.com
joneill@pszjlaw.com

Co-Counsel for the Reorganized Debtors